

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT  
IN AND FOR THE WESTERN DISTRICT OF WASHINGTON

CHARA CURTIS, CYNTHIA ALDRICH, AND ALFRED  
CURRIER,

PLAINTIFFS,

v.

ILLUMINATION ARTS, INC., a Washington Corporation,  
ILLUMINATION ARTS PUBLISHING, LLC, a Washington  
Limited Liability Company, JOHN M. THOMPSON and  
KIMMIE LYNN THOMPSON,

DEFENDANTS.

Cause No. 2:12-cv-00991-JLR

DECLARATION OF MATTHEW KING IN RESPONSE  
TO MOTION FOR SANCTIONS AND JUDGMENT

I, Matthew King, hereby declare:

1. I am over the age of 18, competent to testify, and I make this declaration upon my personal knowledge.
2. On August 23, 2013, Defendants requested I cease representing them in this matter.
3. In response, I drafted a Motion to Withdraw, scheduled to be heard on September 13, 2013.

CONSOLIDATED RESPONSE TO MOTION FOR  
PARTIAL SUMMARY JUDGMENT

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4. After receiving the Motion for Withdrawal, Defendants advised me that they wish I remain as counsel for the corporate defendants.
5. I advised them that I cannot due to the client confidences and secrets I have acquired in representing the Defendants as a group.
6. The Defendants then requested I draft this response to the motion.
7. The Defendants prepared their own *pro se* Declaration of John Thompson and the exhibits thereto.
8. I have not verified the information in the Thompson Declaration or the exhibits thereto.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 26<sup>th</sup> day of August, 2013 at Sammamish, Washington.

**The Law Offices of Matthew R. King, PLLC**

/s/ \_\_\_\_\_

Matthew R. King, WSBA 31822  
Attorney for Plaintiff/Respondent  
1420 Fifth Avenue, Suite 2200  
Seattle, WA 98101  
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DECLARATION OF SERVICE

I, Matthew King, hereby declare under penalty of perjury under the laws of the State of Washington, that I caused a copy of this document to be e-filed with the United States District Court, Western District of Washington, as required by the Court Rules and served via United States District Court ECF to:

Amit D. Ranade  
Kurt E. Kruckeberg  
Hillis Clark Martin & Peterson, P.S.  
1221 Second Avenue, Suite 500  
Seattle, WA 98101-2925

on the 26<sup>th</sup> day of August, 2013.

Dated this 26<sup>th</sup> day of August, 2013 at SEATTLE, Washington.

**The Law Offices of Matthew R. King, PLLC**

/s/

Matthew R. King, WSBA 31822  
Attorney for Plaintiff/Respondent  
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